

PHILLIP A. TALBERT
United States Attorney
VINCENTE A. TENNERELLI
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HEATHER STANLEY,

Defendant.

CASE NO. 1:20-CR-00045-JLT-SKO

STIPULATION TO CONTINUE
MARCH 16, 2022, STATUS CONFERENCE

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This matter was set for status on March 16, 2022, at 1:00 p.m. By this stipulation, defendant now moves to continue the status conference until June 1, 2022, and to exclude time between March 16, 2022, and June 1, 2022, under Local Code T4.

2. The parties agree and stipulate, and request that the Court find the following:

a) Counsel for defendant desires additional time to review discovery, discuss this case with his client, and explore possible resolutions of this matter with his client and the government.

b) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

1 c) The government does not object to the continuance.

2 d) Based on the above-stated findings, the ends of justice served by continuing the
3 case as requested outweigh the interest of the public and the defendant in a trial within the
4 original date prescribed by the Speedy Trial Act.

5 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
6 et seq., within which trial must commence, the time period of March 16, 2022, to June 1, 2022,
7 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
8 because it results from a continuance granted by the Court at defendant's request on the basis of
9 the Court's finding that the ends of justice served by taking such action outweigh the best interest
10 of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: March 9, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ VINCENTE A. TENNERELLI
VINCENTE A. TENNERELLI
Assistant United States Attorney

Dated: March 9, 2022

/s/ DAVID TORRES
DAVID TORRES
Counsel for Defendant
HEATHER STANLEY

ORDER

IT IS SO ORDERED.

DATED: 3/9/2022

Sheila K. Oberto
THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE